

UNITED STATES DISTRICT COURT
for the
Eastern District of Virginia

United States of America)
v.)
BENJAMIN JONES)
Case No. 1:22-mj-21
UNDER SEAL

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Oct. 2018 through Dec. 2021 in the city/county of Fairfax
in the Eastern District of Virginia, the defendant(s) violated:

Code Section

Offense Description

¹⁸ U.S.C. §§ 2261A(2) and 2261(b)(6) Stalking.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

Reviewed by AUSA/SAUSA

AUSA Zoe Bedell

Printed name and title

Complainant's signature

FBI Task Force Officer John Bamford

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone *(specify reliable electronic means).*

Date: 02/01/2022

Digitally signed by Ivan Davis
Date: 2022.02.01 14:31:55
-05'00'

Judge's signature

City and state: Alexandria, Virginia

The Honorable Ivan D. Davis, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA

v.

BENJAMIN JONES,

Defendant.

Case No. 1:22-mj-21

UNDER SEAL

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, John Bamford, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Detective with the Arlington County Police Department (ACPD) in Northern Virginia and have been so employed since 2008. Currently I am assigned as a Task Force Officer with the Federal Bureau of Investigation, where I am assigned to the Cyber Crime Squad of the Washington Field Office. In this role, I investigate computer-related crimes. As such, I have participated in numerous investigations involving computer and high-technology related crimes including computer intrusions, online extortion, online threats, internet fraud, credit card fraud, and bank fraud.

2. In the course of conducting or participating in criminal investigations, I have been involved in the following: interviewing and debriefing witnesses and informants; conducting physical surveillance; tracing and analyzing Internet Protocol (IP) addresses; tracing and analyzing financial transactions; analyzing telephone pen registers; collecting and analyzing evidence; and preparing and executing search warrants. I also have participated in the

investigation of financial crimes such as wire fraud and money laundering, and in cases involving fraudulent activity in connection with computers and email.

3. The facts and information contained in this affidavit are based upon my training and experience, personal knowledge, and observations during the course of this investigation, as well as the observations of other agents involved in this investigation. This affidavit contains only the information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. I make this affidavit in support of a criminal complaint and arrest warrant for **BENJAMIN JONES**. Based on the information detailed below, I submit that there is probable cause to believe that, beginning in or around October 2018 and continuing through at least December 2021, **JONES** violated 18 U.S.C. §§ 2261A(2) and 2261(b)(6) (stalking).

PROBABLE CAUSE

5. Since in or around October 2018, **JONES** has repeatedly contacted an individual with whom **JONES** was formerly in a romantic relationship (herein, “Victim 1”). As explained below, **JONES** has placed numerous phone calls to Victim 1 and sent numerous text messages and emails to Victim 1 that were threatening, harassing, and unwanted.¹ For instance, **JONES**’s communications have included: (a) threats to physically harm Victim 1; (b) threats to physically harm any significant other or children Victim 1 may have in the future; (c) messages attempting to dissuade Victim 1 from contacting law enforcement or continuing to be in contact with law enforcement; and (d) messages intended to harass and annoy Victim 1. **JONES** has sent these

¹ During the majority of the time period covered by this affidavit, Victim 1 resided in the Eastern District of Virginia. During the entire time period covered by this affidavit, **JONES** resided in a different state than Victim 1.

messages despite Victim 1 obtaining a protective order in the County of Fairfax, Virginia, which is within the Eastern District of Virginia, that prohibited **JONES** from contacting Victim 1.²

6. The investigation also has revealed that **JONES** has attempted to locate information about Victim 1 (including Victim 1's residential address), and that **JONES** sent a package to the residence of a relative of Victim 1 that contained a "glitter bomb," *i.e.*, a package that releases glitter and other objects upon being opened.

A. Threatening Communications Sent to Victim 1

7. The FBI's investigation has revealed that Victim 1 has received numerous threatening messages from several email accounts that the FBI has attributed to **JONES**.³

8. Specifically, on September 17, 2021, the Honorable Ivan D. Davis issued a search warrant to Google for certain records relating to, among other accounts, [Victim 1]isastupidwhore@gmail.com,⁴ [Victim 1]willpay@gmail.com, f[Victim 1]962@gmail.com, i[Victim 1]724@gmail.com, [Victim 1]isdead@gmail.com, i[Victim 1]846@gmail.com, hinoodle735@gmail.com,⁵ nisaskinnyuglyslut@gmail.com, [Victim 1]isaidiot@gmail.com, goodluck[Victim 1]@gmail.com, [Victim 1]isuglyandstupid@gmail.com, hunt[Victim 1]andkill@gmail.com, and kill[Victim 1]726@gmail.com. The records that Google produced

² Although Victim 1 obtained a new phone number and email address during the time **JONES** has engaged in this course of conduct, Victim 1 retained a phone with Victim 1's original telephone number, which was how **JONES** continued to contact Victim 1. Additionally, **JONES** has sent messages to Victim 1's email account at Victim 1's place of work.

³ The manner by which the email accounts discussed in Part A have been attributed to **JONES** is set forth below.

⁴ Unless otherwise noted, where "Victim 1" is used inside brackets, it refers to Victim 1's first name only.

⁵ Law enforcement has learned from Victim 1 that **JONES** referred to Victim 1 by the nickname "noodle" during their relationship.

revealed that the aforementioned email addresses had sent messages that expressly and implicitly threatened injury, in the form of murder, torture, and/or other bodily harm, to either Victim 1 or Victim 1's future significant other or future children. Examples of threatening messages that Victim 1 received include the following:

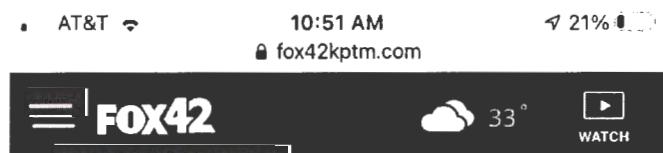
- a. On or about October 16, 2020, an email was sent from [Victim 1]isastupidwhore@gmail.com stating, "If you don't find me I'm gonna find you and I'm gonna make sure you're fucking terrified when that happens."
- b. On or about October 21, 2020, an email was sent from [Victim 1]isastupidwhore@gmail.com stating, "Every time I wake up from a goddamn fucking dream of you it makes me want to fucking bash your head in so much more. Every other fucking night I have to see you in my fucking dreams and it makes me pissed when I wake up. Your fucking dead [Victim 1]. Fuck you so much. I'll see you in hell. FUCK YOU. You stupid GODDAMN SLUT."
- c. On or about October 27, 2020, an email was sent from [Victim 1]willpay@gmail.com stating, "Go fuck yourself and burn in hell you fucking retarded cunt. I can't wait to punch you in the face myself."
- d. On or about November 23, 2020, an email was sent from f[Victim 1]962@gmail.com stating, "You're a fucking whore that's going to fucking die. You're fucked as shit when I get my hands on you."
- e. On or about December 1, 2020, an email was sent from i[Victim 1]724@gmail.com stating, "I'm gonna strangle you with your own cut off half eaten arm. You're a whore that deserves to die."

f. On or about December 24, 2020, an email was sent from [Victim 1]isdead@gmail.com stating, “You stupid dumb fucking dead whore :)”

g. On or about December 29, 2020, an email was sent from [Victim 1]846@gmail.com stating, “I fucking hate you so much the only thing I want to do ever is just make your life miserable. It frustrates me a lot all I can do now is send emails but I just have to be patient bc the time will come. It doesn’t matter how long. I’ll take your kids. I’ll find where you live and make sure you never feel safe there. I’ll find you and hurt you. Whatever it takes to make you hurt or scared I’ll figure it out. You’re a disgusting piece of trash [Victim 1] and you need to be taken out.”

h. On or about December 29, 2020, an email was sent from hinoodle735@gmail.com in which the subject line stated “You’re a dead bitch. Rip [Victim 1].” This same email address sent a message on December 28, 2020, that stated, “I’m dreaming about you a lot again. I miss you [Victim 1]. I’m still gonna kill you but I miss you. Can we please talk.”

i. On or about January 10, 2021, an email was sent from nisaskinnyuglyslut@gmail.com stating, “kinda close to what I have in mind.” The email included a screenshot from a news article (shown below) describing how police believed a subject in a homicide used a hatchet to dismember a victim while the victim was still alive.



Disturbingly, deputies believe Castillo used a hatchet to dismember Perry while she was still alive, inflicting as much pain as possible on her. A witness said another suspect asked

j. On or about January 11, 2021, an email was sent from nisaskinnyuglyslut@gmail.com stating, “You’re a dead whore [Victim 1]...fuck you.”

k. On or about March 1, 2021, an email was sent from [Victim 1]isaidiot@gmail.com stating, “It’s my duty my job my purpose to make sure that you never achieve happiness so I will always be lurking in the shadows and as soon as you get things you want I will take them away.”

l. On or about February 26, 2021, an email was sent from [goodluck\[Victim 1\]@gmail.com](mailto:goodluck[Victim 1]@gmail.com) stating, “I’m never going to leave you alone [Victim 1]. Try running scared to the police again and see what happens.”

m. On or about March 1, 2021, an email was sent from [Victim 1]isuglyandstupid@gmail.com stating, “I swear to god if you go to the police again you will regret it...you could just talk to me...the police wont protect you. I promise you that.”

n. On or about March 2, 2021, an email was sent from [Victim 1]isuglyandstupid@gmail.com stating, “I’m Not afraid of dying or being homeless or being in jail. Have you ever thought about being tortured? It’s the worst possible fate for man....I know death but I don’t know torture but I will make you know it.”

9. A number of the email addresses themselves also constituted threats. For example, between on and about October 13, 2020, through on and about January 18, 2021, Victim 1 received emails from the following addresses: [hunt\[Victim 1\]andkill@gmail.com](mailto:hunt[Victim 1]andkill@gmail.com), [kill\[Victim 1\]41@gmail.com](mailto:kill[Victim 1]41@gmail.com), [kill\[Victim 1\]726@grmail.com](mailto:kill[Victim 1]726@grmail.com), [\[Victim 1\]isdead@gmail.com](mailto:[Victim 1]isdead@gmail.com), [\[Victim 1\]willdie@gmail.com](mailto:[Victim 1]willdie@gmail.com), [rip\[Victim 1\]@gmail.com](mailto:rip[Victim 1]@gmail.com), and [\[Victim 1\]willpay@gmail.com](mailto:[Victim 1]willpay@gmail.com).

B. Harassing Communications Sent to Victim 1

10. Since late 2018, **JONES** has used a large number of email accounts and phone numbers to contact Victim 1 via email, text messages, and phone calls.

11. Some of the emails discussed in this Part were identified through a search warrant. Specifically, harassing emails were found within the records associated with the following email accounts (which Google provided in response to the September 17, 2021 search warrant that the Honorable Ivan D. Davis issued): dontdisablemyid@gmail.com, plmnnn131@gmail.com, benj8144@gmail.com, benj685441@gmail.com, bj867765@gmail.com, benj12121212121212@gmail.com, bj1121834456@gmail.com, bj95847362@gmail.com, benj685@gmail.com, bj214326543@gmail.com, treeben311@gmail.com, inalwdeidniel@gmail.com, [Victim 1]isbest302@gmail.com, imsorry[Victim 1]@gmail.com, jnsben70@gmail.com, [Victim 1]inheart@gmail.com, hey[Victim 1]00@gmail.com, heyb74237@gmail.com, [Victim 1]iloveyou263@gmail.com, bhey8349@gmail.com, [Victim 1]andben1@gmail.com, benj128934675@gmail.com, jben10759@gmail.com, ndnsddcnt@gmail.com, [Victim 1]willpay@gmail.com, rip[Victim 1]@gmail.com, kill[Victim 1]726@gmail.com, f[Victim 1]962@gmail.com, Benj96016@gmail.com, and [Victim 1]goaway@gmail.com.

12. Other emails in this Part were identified as a result of a search warrant that law enforcement executed on or about October 28, 2021, at **JONES**'s residence. Through that search, law enforcement seized an Apple iPhone,⁶ and a subsequent digital forensic analysis revealed that the following accounts were accessible on it: 213das11@gmail.com,

⁶ **JONES** claimed ownership of the phone and provided the pin code to unlock it.

benj685@gmail.com, benj685441@gmail.com, benj8144@gmail.com, benj96016@gmail.com, dontdisablemyid@gmail.com, plmnnn131@gmail.com, and treeben311@gmail.com.⁷

13. Additionally, Victim 1 allowed law enforcement to examine both of Victim 1's cellular phones that had received messages from JONES. Victim 1 also provided the emails sent to Victim 1's work email address in their native format.

14. The following is a sample of harassing messages from the above-referenced sources:

Date	Account	Content
12/29/2018	dontdisablemyid@gmail.com (sent as text message)	I'm sorry for making you feel bad
3/12/2020	plmnnn131@gmail.com	I had a crazy dream about you
4/11/2020	benj8144@gmail.com	The ex that got a restraining order against me is in like a 5 year relationship and she still is trying to help me as much as she can. That's what a good person does. You are not a good person
4/18/2020	benj685441@gmail.com	It makes me sad to think we might never talk again :(I don't want to talk to anyone except you
4/26/2020	bj867765@gmail.com	How have you been? We haven't talked in forever and it makes me really sad :(I miss you a bunch every day and I keep waiting to hear from you but I never do :(
5/6/2020	benj1212121212121212@gmail.com	My dream with you was good and then it got bad :(why can't it just be good :((it's frustrating having bad dreams with you its the only time i see you I just want them to be good
6/4/2020	bj1121834456@gmail.com	I had a really scary dream with you in it last night :(I'm really worried we'll never talk again

⁷ Another notable email that was determined to be accessible on the seized Apple iPhone was ben.jones1650@gmail.com.

6/17/2020	bj95847362@gmail.com	I hope you have a good day <heart emoji> I love you <heart emoji>
6/21/2020	benj685@gmail.com	< sent 236,800 heart emojis>
6/21/2020	bj214326543@gmail.com	I love you [Victim 1]<heart, kiss face, and happy face emojis>
6/27/2020	treeben311@gmail.com	<honey pot, smiley face, heart, kiss face, emojis>
6/28/2020	inalwdeidniel@gmail.com	I love you<heart emoji>
7/1/2020	213das11@gmail.com	You're the best thing that ever happened to me. I love you
8/27/2020	[Victim 1]isbest302@gmail.com	I love u <heart emoji>
8/31/2020	imsorry[Victim 1]@gmail.com	Good morning <heart emoji> I hope you have a good day at least. I need to study a lot tmrw. I hope you don't get me in trouble
9/1/2020	jnsben70@gmail.com	Hey [Victim 1] Bye [Victim 1]
9/4/2020	[Victim 1]inheart@gmail.com	[Victim 1] it's so hard seeing you in my dreams :(I miss you soo much
9/4/2020	hey[Victim 1]00@gmail.com	Please tell me what to do to fix stuff between us. This is killing me it's torture. I need to hear from you... why are you doing this to me??
9/7/2020	heyb74237@gmail.com	[Victim 1] I'm gonna come back into your life no matter what so it might be better if it's on mutual terms. I love you and stay safe
9/11/2020	[Victim 1]iloveyou263@gmail.com	[Victim 1] why are you doing this... I thought we were friends and I thought you cared about me
9/14/2020	bhey8349@gmail.com	Where the fuck are you [Victim 1]. Text me. God damnt [Victim 1]. You're making me fucking mad and then im really gonna fuck with you. You must really not like your life. Why don't you like it? Why don't you want it?
9/19/2020	banllovellsee@gmail.com	I need to talk to you [Victim 1]
9/29/2020	benj128934675@gmail.com	Hey whore are you there? Whore?
9/29/2020	jben10759@gmail.com	I hope you die cunt. Love you :)

10/26/2020	ndnsddcnt@gmail.com	Fuuoooockckkkkk you :) Sent from my iPhone
10/27/2020	[Victim 1]willpay@gmail.com	Go fuck yourself and burn in hell you fucking retarded cunt. I can't wait to punch you in the face myself
11/16/2020	rip[Victim 1]@gmail.com	You're gonna die
11/20/2020	kill[Victim 1]726@gmail.com	Hi dead bitch :) go fuck yourself
11/23/2020	f[Victim 1]962@gmail.com	You're a a fucking whore that's going to fucking die. You're fucked as shit when I get my hands on you
3/1/21	Benj96016@gmail.com	"I would never actually do anything crazy like hurt you physically but I underestimate emotional stuff for some reason."
3/3/21	[Victim 1]goaway@gmail.com	"I need to stop emailing you."
8/7/2019	(XXX) XXX-4625	I'm really sorry for being so crazy [Victim 1]. I'm serious about wanting to find someone else and move on from you. I want to stop spending money on this and I want to stop being a bad person. Even if I stop and move on I'm never going to be happy with us leaving everything on this type of note. I know it's all my fault but you're still really important to me. I know you probably remember and think about how I hurt you and all the bad things I did that you wouldn't want someone to do. I'm really sorry for all of that and I'm sorry I'm still doing this now. I hated that I used you at one point and basically made you hate me for doing that as well as other stuff probably. I guess I will just never hear from you again and we will never be in each other's lives ever again bc that's clearly what you want but that's not what I want at all. I'm still going to send you that stuff. It's hard for me to give up on us being friends again because I remember how much we cared about

		each other (even if you don't think I did, I promise I did and do). I know you probably hate me a lot and probably the only way that could even change is if I left you alone for a really long time and eventually maybe you would want to talk but I kind of even doubt that ☹ I beat myself up over so much stuff that happened with you [Victim 1]. You're not just some random person to me. I'm not going to forget how special you were to me and I wish you could have better memories of me than you have now. I think you're so amazing [Victim 1] and like every
11/7/2020	(XXX) XXX-0386	You're a dead bitch [Victim 1]
12/25/2020	(XXX) XXX-0386	Merry Christmas slut. You should kill your self and do the world a favor
2/22/2021	(XXX) XXX-0386	I also underestimate the negative effects of harassing type behavior, some part of me wants to be harassed, some part of me wants someone to be so obsessed over me that they act completely crazy so I almost feel like I'm following the golden rule by being harassing because I wish someone would do that to me but I don't think that's what I really want, I needed to have thought more about standards and boundaries I expected from relationships. And not be afraid of taking risks with communication. And other things but those are two big ones that prevented past intimate relationships from flourishing I guess, I'm sorry for making things harder for you than they should of been. I kinda outweighed the good stuff with all the bad stuff and I wish that wasn't the case, sorry for being confusing and bullying and not thinking about your perspective enough, I lacked a lot of empathy compassion and courage. I can't take away any of the bad things

		but I wish I could add more good but maybe all I can do with that is leave you alone as much as possible. I love you and miss you [Victim 1]
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15. Victim 1 also received large batches of messages from **JONES**. For example, over the course of the day on or about April 4, 2019, Victim 1 received almost 90 text messages from approximately three different phone numbers (XXX- XXX-1364, XXX-XXX-6471, and XXX-XXX-9388). Later, over the course of approximately three hours on or about June 29, 2020, Victim 1 received over 1,000 emails from benand[Victim 1]00@gmail.com containing statements like “hi,” “I miss you babe,” and “I love you,” as well as an assortment of emojis. And on or about June 30, 2020, Victim 1 received over 1,600 emails from afnrrvendaneeniodbe@gmail.com and ba82kw@gmail.com in the space of approximately 5.5 hours containing either the word “hi” or a random assortment of characters and/or emojis.

16. During the course of the investigation, Victim 1 provided a spreadsheet to law enforcement that Victim 1 had prepared. The spreadsheet reflected the phone numbers and email addresses that Victim 1 believed to be controlled by **JONES**, as well as the content of each of those messages. The upshot of the spreadsheet was that the phone numbers and emails listed within the spreadsheet had, according to Victim 1, contacted Victim 1 at least approximately 4,900 times from 2018 through early 2021. I know from the investigation conducted to date that Victim 1 also received emails, texts, and calls believed to be from **JONES** that were not logged in this spreadsheet.

17. Accounts attributable to **JONES** also sent messages indicating that **JONES** understood that his behavior was threatening, harassing, and would scare or otherwise upset Victim 1.

a. For example, on or about April 7, 2019, **JONES** texted Victim 1, “I told a friend what I was doing to you and I asked her how it felt to have this happen bc I kinda did it to her too and she said it was terrifying.”

b. Similarly, on or about April 1, 2020, **JONES** sent Victim 1 from plmnnn131@gmail.com that stated, “And I’m sorry for harassing you because it’s probably scary and might make you think you never knew me but you did.”

c. Likewise, in a text message sent on or about April 2, 2019, **JONES** told Victim 1: “I’m already upset about this situation and I shouldn’t deal with it by harassing you but for some reason that’s what I do.”

d. In addition, as part of a series of over 60 text messages sent on or about December 31, 2018, **JONES** acknowledged that his use of multiple different phone numbers was “weird” and “annoying,” but threatened: “I have infinite numbers I can text or call you from and I’ll call you at a much higher frequency if I can’t text you from my number.”

e. Similarly, in a series of over 60 text messages sent on or about April 6, 2019, **JONES** told Victim 1, “I like torturing myself and annoying you, I would seriously text you a lot less if you unblocked me [sic] number,” and he suggested that he should speak with an ex-girlfriend of his who had previously taken out a restraining order against him so that he could “ask her what it’s like to be harassed so I can understand better.”

f. Moreover, on or about February 21, 2021, Victim 1 received a text from **JONES** that stated, “I really just wanted to annoy you a ton I didn’t want to make you actually scared.”

C. Attribution of the Messages to JONES⁸

18. Law enforcement attributed to **JONES** the above-referenced email messages and accounts, along with numerous others used to send harassing communications to Victim 1. This was achieved through a variety of means, including legal process results that indicated accounts had been accessed by IP addresses assigned to **JONES**'s residence, cookie linkage,⁹ and recovery phone numbers.

User Attribution of Email Addresses

19. Records provided by Google revealed that the following email addresses referenced in the preceding paragraphs (as indicated in the table below) had been accessed via IP addresses 47.155.218.7, 47.155.26.116, 47.151.203.240, and/or 47.155.27.107 (hereinafter “IP-1,” “IP-2,” “IP-3,” and “IP-4” respectively):

Email Address	Paragraph	IP Addresses
[Victim 1]andben1@gmail.com	11	IP-1
[Victim 1]iloveyou263@gmail.com	11, 14	IP-1
[Victim 1]inheart@gmail.com	11, 14	IP-1
[Victim 1]isastupidwhore@gmail.com	8, 8(a), 8(b)	IP-1

⁸ Law enforcement has attributed many accounts to **JONES** in multiple ways. This section does not review every account believed to be associated with **JONES**, nor does it provide every form of attribution for each account discussed.

⁹ According to Google’s “Privacy & Terms” webpage, “a cookie is a small piece of text sent to your browser by a website you visit.” Google, “How Google Uses Cookies,” last visited June 29, 2021, available at <https://policies.google.com/technologies/cookies?hl=en-US>.

As Google explains its practices, a linkage via cookie can occur when accounts utilize the same browser within the same device. See Google, “Cookies and User Identification,” last visited Dec. 6, 2021, available at <https://developers.google.com/analytics/devguides/collection/analyticsjs/cookies-user-id>. Thus, a cookie linkage indicates a linked email address was accessed on the same internet browser on the same device as another account.

[Victim 1]isbest302@gmail.com	11, 14	IP-1
[Victim 1]isdead@gmail.com	8, 8(f), 9	IP-1
213das11@gmail.com	12, 14	IP-1
ben.jones1650@gmail.com	12	IP-1, IP-2, IP-3
benand[Victim 1]00@gmail.com	15	IP-1
benj1212121212121212@gmail.com	11, 14	IP-1
benj128934675@gmail.com	11, 14	IP-1
bhey8349@gmail.com	11, 14	IP-1
bj1121834456@gmail.com	11, 14	IP-1
bj214326543@gmail.com	11, 14	IP-1
bj95847362@gmail.com	11, 14	IP-1
hey[Victim 1]00@gmail.com	11, 14	IP-1
heyb74237@gmail.com	11, 14	IP-1
imsorry[Victim 1]@gmail.com	11, 14	IP-1
inalwdeidniel@gmail.com	11, 14	IP-1
jnsben70@gmail.com	11, 14	IP-1
treeben311@gmail.com	11, 12, 14	IP-1
[Victim 1]goaway@gmail.com	11, 14	IP-2
[Victim 1]isuglyandstupid@gmail.com	8, 8(m), 8(n)	IP-2
[Victim 1]willpay@gmail.com	8, 8(c), 11, 14	IP-2
benj96016@gmail.com	11, 12, 14	IP-2
f[Victim 1]962@gmail.com	8, 8(d), 11, 14	IP-2
goodluck[Victim 1]@gmail.com	8, 8(l)	IP-2
hinoodle735@gmail.com	8, 8(h)	IP-2

hunt[Victim 1]andkill@gmail.com	8, 9	IP-2
jben10759@gmail.com	11, 14	IP-1, IP-2
nisaskinnyuglyslut@gmail.com	8(i), 8(j)	IP-2
benj685@gmail.com	11, 12, 14	IP-3
i[Victim 1]724@gmail.com	8, 8(e)	IP-3
i[Victim 1]846@gmail.com	8, 8(g)	IP-3
kill[Victim 1]726@gmail.com	8, 9, 11, 14	IP-3
ndnsddcnt@gmail.com	11, 14	IP-3
rip[Victim 1]@gmail.com	11, 14	IP-3
benj685441@gmail.com	11, 12, 14	IP-4
benj8144@gmail.com	11, 12, 14	IP-4

20. In addition, records obtained from Frontier Communications of America, revealed that, during the time of access to the aforementioned accounts, IP-1, IP-2, IP-3, and IP-4 were assigned to an account in **JONES**'s mother's name at **JONES**'s address.

21. Moreover, records provided by Google has revealed that [Victim 1]isaidiot@gmail.com and [Victim 1]isastupidwhore@gmail.com were linked by cookies to benj96016@gmail.com, goodluck[Victim 1]@gmail.com, jben10759@gmail.com, [Victim 1]goaway@gmail.com, and [Victim 1]isuglyandstupid@gmail.com. And, all of these linked accounts had been accessed via IP-2.

22. The iPhone seized from **JONES**'s home, which, again, **JONES** claimed ownership of, has been determined to be associated with some of the email addresses identified in Parts A and B. Specifically, the following email addresses were associated with user accounts

found on the iPhone:¹⁰ 213das11@gmail.com, ben.jones1650@gmail.com, benj26983@gmail.com, benj685@gmail.com, benj85441@gmail.com, benj8144@gmail.com, benj96016@gmail.com, dontdisablemyid@gmail.com, hi[Victim 1]046@gmail.com, jben10759@gmail.com, plmnnn131@gmail.com, and treeben311@gmail.com.

User Attribution of Phone Numbers

23. The recovery phone number for the accounts bj867765@gmail.com and plmnnn131@gmail.com was XXX-XXX-0386, which was the phone number issued to **JONES** and was the phone number found on **JONES**'s iPhone.¹¹

24. Law enforcement has also attributed the phone numbers used to send messages to Victim 1 to **JONES** through various methods, including by the content of the message and through subscriber records. For examples, Victim 1 received messages from various numbers referring to Victim 1 as "noodle," which was a nickname **JONES** had previously used for Victim 1. Other numbers had been obtained using the email address ben.jones1650@gmail.com, which, as discussed above, is attributed to **JONES**. Other phone numbers were attached to accounts that used **JONES**'s phone number XXX-XXX-0386, discussed above.

25. Victim 1 also received the following examples of messages from accounts believed to belong to **JONES** referencing changing phone numbers:

¹⁰ The iPhone also contains at least two accounts that may not primarily belong to **JONES**. One appears to be an email account in the name of his father while another appears to be a variation of his mother's name. Law enforcement believes that even though these accounts exist on the phone, **JONES** was the one exercising complete dominion and control over the phone since it was with him at the residence, his father lives in a different state, and his mother was at work.

¹¹ This was also the phone number Victim 1 had used to contact **JONES** when they were still in contact.

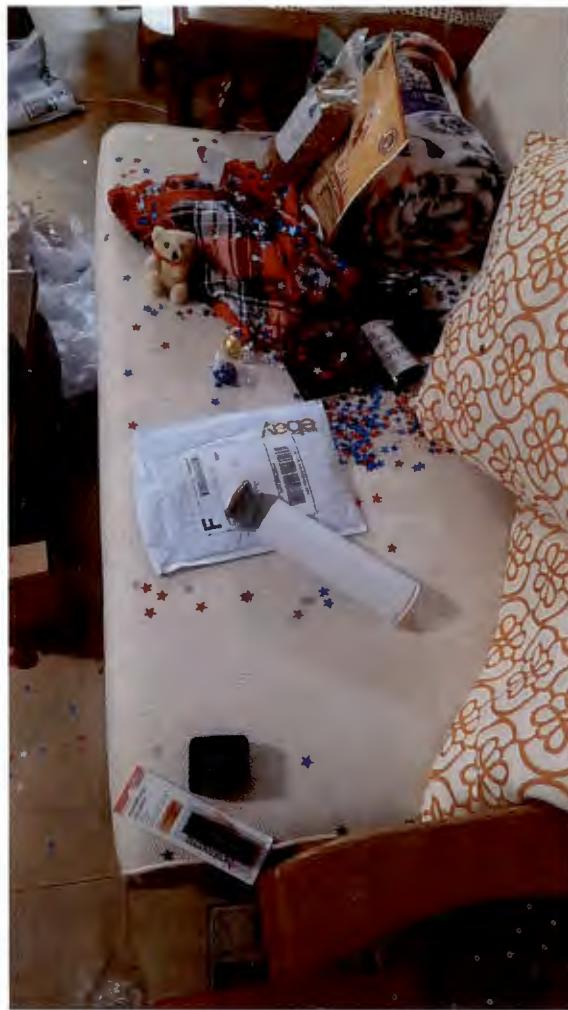
- a. On or about April 4, 2019, the phone number of XXX-XXX-6471 sent a message stating in part, “I’ll use this for a while before switching numbers or I might not even do that at all.”
- b. On or about April 6, 2019, the phone number of XXX-XXX-8171 sent a message stating, “If you unblock me it’s a win win bc then I can text you normally and you don’t have to get texts from all these numbers. Can you at least tell me why I’m blocked.”
- c. On or about August 8, 2019, the phone number of XXX-XXX-8326 sent a message stating, “It’s getting really annoying that I can’t text you from my real number.”
- d. On or about May 4, 2020, ben.jones1650@gmail.com sent a message stating, “I spent \$100s on phone numbers to text you and I feel so dumb for doing that but I kept feeling the need to reach you somehow. I wish I didn’t waste all that money and I wish I wasn’t wasting all this time but I don’t want anybody else. You’re the only person in my heart and I feel like I would spend 100s more just to be able to tell you stuff and have you actually see it. I know I’m gonna end up making more emails to send you stuff which feels so stupid but it makes it more likely you see my messages then it’s probably worth it. I love you forever and always [indecipherable emoji] [heart emoji].”

26. Similarly, on or about April 26, 2020, benj128934675@gmail.com sent a message regarding using different email addresses to contact Victim 1, stating, “It’s sad I have to keep making new emails bc I feel like you block ones when I send stuff to you [sad face emoji] I have to keep trying to tell you stuff so I wish I could do it with less stress. I have a pretty good idea to

find out your new number so it might be better if you just emailed me back so I don't have to bother you at your phone number [smiling emoji] [heart emoji].”

D. Glitter Bomb Sent to Victim 1’s Family Member’s Residence

27. Victim 1 also informed law enforcement that Victim 1 had received a “glitter bomb.” According to Victim 1, Victim 1 spent Christmas 2020 at a family member’s residence, which is not located within the Eastern District of Virginia. While there, Victim 1 received a package addressed to Victim 1 and opened the package on Christmas Day. Upon opening the package, the package exploded, shooting out cutouts of red and blue stars and white sperm. A photograph of the opened glitter bomb is below:



28. Victim 1 stated that the “glitter bomb” signaled not only that **JONES** had elevated his harassment to include now sending physical items, but also that he knew Victim 1’s family member’s address. Victim 1 stated that as a result of receiving this package, Victim 1 did not go outside for two days and was terrified to drive home.

29. Law enforcement’s review of the contents of the various email accounts received via search warrants revealed that on or about December 14, 2020, an email was sent to the email account of ben.jones1650@gmail.com from a company known as Ship Your Enemies Glitter (www.shipyourenemiesglitter.com; email address of yo@brouhahaowns.com). The email described the item ordered as “The Trump Cannon, Add Jizz Confetti, Double the Confetti double the mess” and stated that it was to be shipped to Victim 1 at Victim 1’s family member’s address.

E. **JONES’s Violation of Protective Orders**

30. On or about February 28, 2021, the Fairfax County General District Court in Fairfax, Virginia, issued a Preliminary Protective Order that ordered **JONES** to have no contact with Victim 1 “of any kind.” Law enforcement personally served this protective order on **JONES** on March 4, 2021. The Preliminary Protective Order was in effect until the date of the hearing for a permanent protective order, which was scheduled for May 19, 2021.

31. On May 19, 2021, the Fairfax County General District Court in Fairfax, Virginia issued a Protective Order. The Santa Barbara, California Sheriff’s Office personally served **JONES** with this order at his residence on July 15, 2021. This Protective Order, issued by the Fairfax County General District Court, ordered **JONES** not to have contact with Victim 1, to include electronic communications. Absent subsequent court action, the order does not expire until May 18, 2023.

32. Since **JONES** was served with the protective orders, Victim 1 has received a number of communications from accounts attributable to **JONES**. For example, on or about July 22, 2021, an email was sent from benj26983@gmail.com that stated, “I hope you have fun doing that camp thing. I would love to hear about it. Miss you and love you [two heart emojis].” Additional emails were sent from this same email address on July 23, July 27, August 12, and August 13, 2021.

33. The digital forensic analysis of **JONES**’s iPhone also revealed that **JONES** called Victim 1’s cellular phone 68 times between when the final protective order was served (*i.e.*, July 15, 2021), and on or about September 28, 2021. It appears that at least some of the calls to Victim 1’s number were made using a caller ID blocking feature.

34. Finally, **JONES** contacted Victim 1 a total of 19 times on or about December 15, 2021, and again on or about December 19, 2021. These contacts are notable because they occurred after the search of **JONES**’s residence, and after **JONES** committed in writing to law enforcement that he would not contact Victim 1 again.

F. **JONES**’s Attempts to Obtain Information on Victim 1

35. On or about September 11, 2019, an email was sent to benj685@gmail.com from the company known as BeenVerified. According to its website, BeenVerified is a company that allows subscribers to obtain public records reports on individuals. This email, which was directed to “Ben,” contained a link to a report in the name of Victim 1. It is uncertain at this time whether **JONES** obtained or reviewed this report.

36. On or about September 19, 2019, an email was sent to benj685@gmail.com from the company known as TruthFinder. According to its website, TruthFinder is a company that allows subscribers to obtain public records reports on individuals. This email, directed to “Ben,”

purported to contain a link to a report in the name of Victim 1, including “5+ Personal Records..., 1 Image, and 1 Potential Criminal Records Associated with [Victim 1] in [State].” The state mentioned is the same state where a close family member of Victim 1 lives and where the glitter bomb was sent. This email offered a 50% discount to view the report. The email also listed various the names of purported relatives of Victim 1. It is uncertain at this time whether **JONES** obtained or reviewed this report.

37. On or about June 18, 2020, two emails were sent to bj95847362@gmail.com from BeenVerified. One email advertised that the report on Victim 1 was ready. The second email stated in part “More info on [Victim 1].” It then advertised services that would allow **JONES** to monitor Victim 1’s phone number, address, and email account. It is uncertain at this time whether **JONES** obtained or reviewed this report or these additional services. Law enforcement obtained records from BeenVerified related to this email address, and they show that an account using this email was created on or about June 18, 2020. The payment type was a PayPal Payment using the email address of ben.jones1650@gmail.com. The BeenVerified records show that the account was logged into a total of four times, twice using IP-1, which, again, law enforcement knows is attributed to **JONES**’s residence. The records from BeenVerified show that two reports were sought on Victim 1 based upon Victim 1’s name, one was sought based upon Victim 1’s email address, and one was sought based upon a phone number associated with Victim 1 that **JONES** had used to try to contact Victim 1.

38. A review of the internet search history of jben10759@gmail.com shows that on March 2, 2021, **JONES** attempted various searches about Victim 1, such as searching Victim 1’s name, Victim 1’s name and the town where a close family member of Victim 1 lives, and Victim 1’s name with the name of the company that currently employs Victim 1.

G. JONES's Statements to Law Enforcement

39. On October 28, 2021, in conjunction with the execution of a search of **JONES**'s residence, law enforcement interviewed **JONES**.¹² During this interview, **JONES** admitted to much of the conduct at issue. For example, **JONES** admitted that he had repeatedly reached out to Victim 1. **JONES** was shown samples of the various emails sent to Victim 1 and indicated that he believed they were all from him. He did not specifically recall each email he was shown, but he did acknowledge creating different email addresses and using them to email Victim 1. **JONES** also admitted that he sent Victim 1 the "glitter bomb." **JONES** also confirmed that a prior girlfriend had received a restraining order against him based on similar conduct.

40. When asked why he kept contacting Victim 1, he stated that his behavior was impulsive and that he had different reasons on different occasions when he reached out. The various reasons he provided included that he was trying to "mess with" Victim 1, trying to get Victim 1 to talk to him again, and trying to annoy Victim 1.

41. During his interview, **JONES** made statements demonstrating that he both intended and understood his messages to be threatening. For example, when asked about his emails telling Victim 1 not to go to the police, he explained that he was trying to sound intimidating because he wanted to dissuade Victim 1 from going to the police, even though he claimed he did not think he had succeeded at being intimidating. He also said he believed Victim 1 would have wanted his behavior to stop, and he identified an email he sent to Victim 1 that said "You're a dead bitch. Rip [Victim 1]" as "wrong."

42. **JONES** has also tried to downplay the severity and effects of his conduct. **JONES** claimed he had only sent Victim 1 around 250 emails and contacts since 2018 and acted

¹² **JONES** was read his *Miranda* rights and waived them.

surprised when he was told that he had sent closer to 5,000 messages. **JONES** acknowledged that was a “crazy lot” of messages. **JONES** was asked how he would feel if he received so many messages, and he stated he would probably feel good. However, when asked if he would feel that way if he received messages from someone with whom he did not want to have contact, he stated he would get tired of it and feel annoyed. When asked if he thought Victim 1 felt scared as a result of his behavior, he said he thought probably not, because Victim 1 would have known that he was not going to hurt Victim 1. **JONES** was asked if he thought his behavior was wrong while it was occurring, and he stated that some of the messages were wrong but not all of them. **JONES** was asked about how he thought Victim 1 felt and he stated Victim 1 probably wanted it to stop. When shown a message he had sent calling Victim 1 a “stupid fucking cunt,” he said it was not something he would normally say.

43. **JONES** claimed during his interview that he suffered from psychotic episodes and would hear voices. He did not claim that these episodes or voices were responsible for his decisions to contact Victim 1.¹³

44. **JONES** was asked if he was going to contact Victim 1 again, and he responded that he would not be able to contact Victim 1 because his phone and computer were being seized. At the conclusion of the interview, he wrote and signed a statement indicating that he would not contact Victim 1 again.

45. Law enforcement also found a journal in **JONES**’s residence that **JONES** admitted was his. In this journal, **JONES** wrote that he understood—and hoped—that his conduct would be threatening and cause Victim 1 fear. For example, **JONES** writes in part “I

¹³ Victim 1 received messages referencing the sender hearing voices and having psychotic episodes, further confirming that the emails and texts were coming from **JONES**.

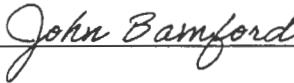
feel proud of harassing [Victim 1] because I feel like it likely [illegible] stress and if I'm lucky, fear. Nothing would make me happier than knowing I made [him/her] scared and terrified. The thought of [Victim 1] being terrified turns me on.”¹⁴ One of the entries references the violation of the protective order. The journal entry states “So we contacted person w/RO against us, I guess worst case I could get arrested and charged w/ violating that order or whatever [I’m] surprised I chose to contact [him/her]. I did not expect myself to violate that RO...I don’t want to go to jail and that decision can do that. I feel like its kind of favorable in terms of it was only a few calls, no threats, no words, Im across the country, first offense. All that doesn’t matter technically especially for moving forward, I feel a lot of anger and sadness.” Based on my training and experience, protective orders are often also referred to as restraining orders, which may be abbreviated RO, and so this entry is believed to reference Victim 1’s protective order against **JONES**.

¹⁴ The excerpts from **JONES**’s journal have been redacted to remove references to Victim 1’s name and gender.

CONCLUSION

46. Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that **BENJAMIN JONES** violated 18 U.S.C. §§ 2261A(2) and 2261(b)(6) (stalking).

Respectfully Submitted,


John Bamford
Task Force Officer, Federal Bureau of Investigation

Subscribed and sworn to me by telephone in accordance with Fed. R. Crim. P. 4.1 on February 1, 2022.

Digitally signed by Ivan Davis
Date: 2022.02.01 14:32:20
-05'00'


The Honorable Ivan D. Davis
United States Magistrate Judge